

## ASH GROVE CEMENT COMPANY

WESTERN REGION  
6720 S.W. MACADAM AVE., SUITE 300  
PORTLAND, OREGON 97219-2312  
(503) 293-2333

December 3, 1993

RECEIVED  
DEC - 6 1993  
AGCW-SEATTLE

Mr. James Nolan  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle, WA 98101-2038

Re: Seattle Plant Operation during SO<sub>2</sub> CEMS replacement.

Dear Mr. Nolan,

As discussed at our meeting December 1, 1993, Ash Grove is ordering a new sample extraction system and SO<sub>2</sub> analyzer for the Seattle plant. This new system should be delivered and installed by July 1, 1994. During the interim, we will maintain SO<sub>2</sub> emissions below our permitted levels utilizing the existing analyzer, knowing that it reports higher than actual. We will reconfirm the high bias of this analyzer upon starting the plant after our February kiln maintenance period.

The NO<sub>x</sub> emissions from the plant may occasionally exceed the prescribed limits as we continue to work to correct the gas burner design flaws that cause it to produce an excessively hot flame. The higher emissions do not arise when the plant burns coal, however we have experienced delays in the conversion to coal due to problems with commissioning the coal firing systems. We expect that the coal firing systems will be operational by January 1, 1994 and we should be able to maintain our permitted emission levels from that time forward, provided we have no further problems with the coal systems.

We will begin to provide the reports as required by Article 12.04 as of the date of our RATA test, November 11, 1993.

Sincerely,



Nathan A. Fernow  
Quality Control Manager  
Western Region

cc: Ken Rone - Ash Grove Cement Co., Seattle  
Matthew Cohen - Heller, Ehrman, White & McAuliffe

AGCS2M000377



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY    ▲    KITSAP COUNTY    ▲    PIERCE COUNTY    ▲    SNOHOMISH COUNTY

December 10, 1993

Nathan A. Fernow  
Quality Control Manager, Western Region  
Ash Grove Cement Company  
6720 SW Macadam Ave., Suite 300  
Portland, OR 97219-2312

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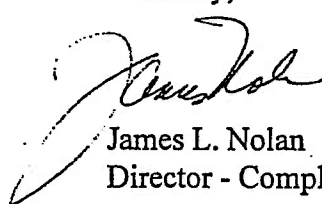
Dear Mr. Fernow:

Ash Grove Cement Company  
Order of Approval No. 3382 (NC 3382)

Thank you for your December 3, 1993 letter concerning our December 1 meeting. Based on the data presented at the meeting, we agree that Ash Grove may use the existing, non-certified SO<sub>2</sub> analyzer as a method for determining compliance with the SO<sub>2</sub> emission standards in Order of Approval No. 3382, until a new SO<sub>2</sub> analyzer is installed and certified. This agreement is based on the premise that the existing SO<sub>2</sub> analyzer is reading too high and that its replacement will take approximately six months.

We understand that the NOx monitor has been certified; however, we have not yet received a copy of Ash Grove's certification test for the monitoring system. Please send a copy of the certification test report as soon as possible, so we may make a final determination concerning certification of the NOx monitor and use of the existing SO<sub>2</sub> monitoring system.

Sincerely,



James L. Nolan  
Director - Compliance

JMW:mj

cc: Alan Butler, Ecology  
Ann Pontius, EPA  
✓ Ken Rone, Ash Grove Cement Co., Seattle  
Matthew Cohen, Heller, Ehrman, White & McAuliffe

Arthur Davidson, Acting Air Pollution Control Officer

## B O A R D O F D I R E C T O R S

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Janet Chalupnik, Member at Large  
Tim Hill, King County Executive

Peter Hurley, Councilman, Snohomish County  
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Norman B. Rice, Mayor, Seattle  
Doug Sutherland, Pierce County Executive  
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